## **EXHIBIT 3-A**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEK SECURITIES CORPORATION and ROX SYSTEMS, INC.

Case No.: 19-CV-02142

(RMB/BCM)

Plaintiffs,

- against –

NICOLAS LOUIS, JONATHAN FOWLER, VOLANT HOLDING, LLC d/b/a VOLANT TRADING, VOLANT: TRADING, LLC, VOLANT LIQUIDITY, LLC, AND VOLANT EXECUTION, LLC

Defendants. :

## DEFENDANTS' FIRST PROPOSED SCHEDULING ORDER

Defendants in the above action propose that the Court enter the following schedule regarding discovery and pretrial submissions:

- A. Parties to make limited document productions by April 9, 2019 as follows:
  - 1. Defendants to produce all documents containing communications between the Individual Defendants and Volant (other than communications protected by the attorney-client privilege); and,
  - 2. Plaintiffs to produce all documents relevant to their allegations that each of the Defendants possess Plaintiffs' the trade secrets and confidential information, including documents sufficient to identify the purported trade secrets, and documents sufficient to show customers and clients to whom Plaintiffs have leased or attempted to lease their clearing system.
- B. Parties are not permitted to take any oral depositions.
- C. The Court to hold a trial on the merits on days during which the Court is available between April 24 and April 30, 2019.

O ORDERED:	
Dated:	
	United States Magistrate Judge